



"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

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May 12, 2020

VIA ELECTRONIC MAIL

All Defense Counsel

Via Electronic Mail

Laura Flahive Wu
Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001

RE: Response to May 6, 2020 Letter Requesting 7 Additional Custodial Files

Dear Counsel,

We are in receipt of your letter on the evening of Wednesday, May 6th requesting seven (7) additional custodial files of current and former employees by Tuesday, May 12th. These newly requested custodians and their respective roles were publicly available and previously disclosed in the document productions Huntington has engaged in for months now.

Over the course of discovery, Huntington has produced hundreds of thousands of records, electronic mail and information concerning individuals in various positions in the Huntington Police Department, including the drug unit and relevant task forces. Plaintiffs have produced custodial files of Huntington Police officers who are also drug task force members including, Head of the Drug unit, Sgt. Paul Hunter's custodial file, Sgt. Paul Minigh's custodial file, Sgt. Shane Bills' custodial file.

Irrespective of custodial files, Huntington additionally searched across document collections for any responsive documents concerning the DEA Heroin Task Force, FBI Task Force and Huntington Violent Crime and Drug Task force. Many of these documents were produced from the Huntington Police Department's archival server and contain documents from Paul Matovich, Stephen Maniskas, Adrian Rosario, Greg Moore and Sid Hinchman. (See Volumes 45-48).

In addition to these aforementioned documents, Huntington has produced hard copy drug unit files and Zuercher database exports from the Special Investigations Bureau ("The Drug Unit"), inclusive of task force cases and enveloping files from the newly requested 5 additional police officers.



May 12, 2020
Page 2

The request for custodial files of these additional 5 task force members is unduly burdensome, cumulative and duplicative in consideration of what has already been collected and produced.

With respect to the other 2 requested custodians, Interrogatory No. 3 asks Plaintiffs to “Identify each Person in Your entity, for each year of the Timeframe, who held the following positions or their equivalents...” Plaintiffs supplemented this Interrogatory with Charles Shaw (who was appointed to City Council less than 2 months ago on March 3, 2020) and Ralph Rider, who served briefly as interim fire chief in 2011, with the intention to provide an accurate update of tenure for former and past employees per department. Plaintiffs are not claiming that these individuals possesses documents, data, or other information relating to the allegations in the instant case and they are not appropriate custodians.

Given the foregoing, if you wish to meet and confer, please advise of available times and dates.

Sincerely,

Temitope “Tope” Leyimu

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